

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

GABRIELLE R. CHAPIN,

Plaintiff,

v.

CREDIT CONTROL SERVICES, INC. d/b/a
THE CCS COMPANIES d/b/a CCS,

Defendant.

**AGREED MOTION TO CONTINUE TRIAL DEADLINES PENDING A RULING ON
DEFENDANT'S MOTION FOR SUMMARY JUDGMENT**

Plaintiff, Gabrielle R. Chapin (“Plaintiff”) and Defendant, Credit Control Services, Inc. d/b/a Credit Collection Services (“CCS”), through their undersigned counsel, jointly move the Court to continue the January 20, 2020 deadline to submit a joint pretrial order, docket call date of January 24, 2020, and the proposed trial date of January 27, 2020, in the above-styled matter.

The trial deadlines are set forth in the Court’s Order Extending Deadlines (Doc. No. 36), entered on November 18, 2019. Pursuant to the procedures outlined in Judge Bennett’s Court Procedures, the parties state as follows in support of their agreed motion:

The parties are awaiting disposition of CCS’ motion for summary judgment (“Motion”). In consideration of judicial resources and expenses the parties would incur associated with trial preparation, the parties respectfully request the Court to set the docket call date 30 days following a ruling on the Motion.

Neither party would be prejudiced by a continuance of the joint pretrial order date, docket call and trial date in this matter, and the parties respectfully request that the Court grant their agreed motion.

Dated: January 8, 2020

By: /s/ Nathan C. Volheim
Nathan C. Volheim, Esq. #6302103
SULAIMAN LAW GROUP, LTD.
2500 S. Highland Ave., Ste. 200
Lombard, IL 60148
(630) 575-8181 x 113 (phone)
(630) 575-8188 (fax)
nvolheim@sulaimanlaw.com

Attorneys for Plaintiff

Dated: January 8, 2020

By: /s/ Sarah E. Doerr
Sarah E. Doerr (Minn. Bar #338679)
Michael S. Poncin (Minn. Bar #296417)
MOSS & BARNETT
150 South Fifth Street, Suite 1200
Minneapolis, MN 55402
Telephone: (612) 877-5297
Fax: (612) 877-5024
Sarah.Doerr@lawmoss.com
Mike.Poncin@lawmoss.com

John W. Bowdich (SBN 00796233)
BOWDICH & ASSOCIATES, PLLC
10440 N. Central Expy., Suite 1540
Dallas, Texas 75231
(214) 307-9500 – Telephone
(214) 307-5137 – Telecopy
jbowdich@bowdichlaw.com

Attorneys for Defendant